

**UNITED STATES BANKRUPTCY COURT**

**SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
SEARS HOLDINGS CORPORATION, et al.	)	Case No: 18-23538 (RDD)
Debtors.	)	(Jointly Administered)
BONNIE MULLINS,	)	
v. Plaintiff,	)	Adversary Proceeding:
KMART CORPORATION, et al.	)	Case No: CV-418370
Defendants.	)	Lake County Superior Court
	)	State of California

**[PROPOSED] ORDER MODIFYING THE AUTOMATIC STAY**

Upon consideration of the Motion for Relief from Automatic heard by this Court on September 11, 2020 at 10:00 am:

**IT IS HEREBY ORDERED** the automatic stay of 11 U.S.C. §362(d)(1) of the United States Bankruptcy Code to be modified to permit Bonnie Mullins to continue a action against Kmart Corporation, as a subsidiary of Sears Holdings Company, (the “Debtor”), filed in Superior Court of California, County of Lake, *Bonnie Mullins v. Kmart Corp., et al.*, Case Number: CV 418370.

It is further **ORDERED** recovery by Bonnie Mullins in the above action shall be limited to the general liability insurance coverage maintained by or available to the Debtor and/or its subsidiaries; she shall not seek additional recovery from the Debtor, its subsidiaries, its estate or successors, in excess of any applicable general liability insurance policy limit(s); this court retains jurisdiction to order other further relief as this Court deems just and proper.

Dated: \_\_\_\_\_, 2020  
White Plains, New York

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Hon. Robert D. Drain  
United States Bankruptcy Judge